



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, THREATS,  
AND  
POLICY AFFAIRS

August 20, 2012

Glen Yankis  
National Park Service  
240 West 5<sup>th</sup> Avenue  
Anchorage, Alaska 99501

Re: EPA comments on the Draft Environmental Impact Statement for the Katmai National Park and Preserve's Brooks River Visitor Access Plan, EPA Project #12-0033-NPS.

We have reviewed the above-referenced EIS (CEQ No. 20120193) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the document's adequacy in meeting NEPA requirements.

The EIS analyzes the No Action Alternative and four action Alternatives. The National Park Service has identified Alternative 4, as both its preferred and the environmentally preferred alternative. We support the selection of this alternative as it minimizes the overall impacts to aquatic resources by maximizing the boardwalk and bridge system. Many of the impacts would be short-term as they are associated with construction. This alternative would also provide long-term benefits to the visitor experience by improving viewing and safety. We encourage the National Park Service to consider bridge materials, color and design that will be best suited for the surrounding natural environment, as well as alternative bridge designs that may further reduce the number of piles and/or support members.

We have assigned a rating of LO (Lack of Objections) to the draft EIS. A copy of the rating system used in conducting our review is enclosed for your reference. We believe that the EIS analyzes an adequate range of alternatives that provides for visitor and management needs while minimizing impacts to the bear population and aquatic resources.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these issues, please contact me at (206) 553-1601 or by email at [reichgott.christien@epa.gov](mailto:reichgott.christien@epa.gov), or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or by email at [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov).

Sincerely,

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.